

UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

United States of America

v.

Gerardo Yahir SANCHEZ-SIQUIEROS,
aka Jesus Acosta

Juan ZUNGHA,
aka Juan Zuniga

CRIMINAL COMPLAINT

CASE NUMBER: 25-4140 MJ PCT CDB

I, the undersigned complainant, being duly sworn, state that the following is true and correct to the best of my knowledge and belief:

COUNT 1

On or about April 15, 2025, in the County of Mohave, in the District of Arizona, the defendant, Gerardo Yahir SANCHEZ-SIQUIEROS knowingly, did have in his possession goods and chattels of a value \$1,000 or more, that is Nike shoes, which had been stolen from a BNSF train while moving in interstate commerce from California to Arizona, knowing the goods and chattels to be stolen, in violation of Title 18, United States Code (U.S.C.), § 659.

COUNT 2

On or about April 15, 2025, in the County of Mohave, in the District of Arizona, the defendant, Juan ZUNGHA knowingly, did have in his possession goods and chattels of a value \$1,000 or more, that is Nike shoes, which had been stolen from a BNSF train while moving in interstate commerce from California to Arizona, knowing the goods and chattels to be stolen, in violation of Title 18, United States Code (U.S.C.), § 659.

I further state that I am a Special Agent for Homeland Security Investigations (HSI) and that this complaint is based on the following facts:

See Attached Statement of Probable Cause Incorporated by Reference Herein.

Continued on the attached sheet and made a part hereof: Yes No

AUTHORIZED BY: AUSAs Ryan McCarthy and Maria Gutierrez



Digitally signed by RYAN
MCCARTHY
Date: 2025.04.17
15:57:02 -07'00'

Gustavo Antonio Barrera, SA for HSI
Name of Complainant

Sworn to telephonically before me

Date

HONORABLE CAMILLE D. BIBLES
United States Magistrate Judge
Name & Title of Judicial Officer

GUSTAVO A BARRERA 
Digitally signed by
GUSTAVO A BARRERA
Date: 2025.04.17
15:48:51 -07'00'

Signature of Complainant

at Flagstaff, Arizona

City and State
Camille D.

Bibles 
Digitally signed by Camille
D. Bibles
Date: 2025.04.17 16:13:58
-07'00'

Signature of Judicial Officer

STATEMENT OF PROBABLE CAUSE

I, Gustavo Antonio Barrera , a Special Agent for Homeland Security Investigations (HSI), being duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the United States (U.S.) Department of Homeland Security (DHS) Homeland Security Investigations (HSI) Flagstaff, AZ, and have been employed since June 2024. During my tenure as a Special Agent, I have completed a 12-week Criminal Investigator Training Program and a 13-week HSI Special Agent Training Program at the Federal Law Enforcement Training Center (FLETC). Prior to my tenure as a Special Agent, I served as a police officer in Arlington County, Virginia for approximately 1 year. I graduated from Marymount University with a Bachelor of Arts in Criminal Justice and a Master of Arts in Forensic Psychology. I am a law enforcement officer of the U.S., and I am empowered by law to conduct criminal investigations, make arrests, and serve search and arrest warrants.

2. As a Special Agent with HSI, Your Affiant investigates criminal violations of United States law, including import and export violations, controlled substances law violations, and money laundering violations. Your Affiant is familiar with investigations involving stolen vehicle organizations, theft rings, possession, manufacture, distribution, and importation of controlled substances, as well as methods used to finance drug transactions. As an HSI Special Agent, Your Affiant has been trained in conducting narcotics and money laundering investigations and received specialized training concerning violations of the Controlled Substances Act contained within Title 21 of the U.S. Code. Your Affiant is currently assigned to the HSI Flagstaff Office located in Flagstaff, Arizona, where we investigate transnational criminal organizations to include money laundering and drug trafficking organizations operating throughout the U.S.

3. By virtue of my employment as a Special Agent, Your Affiant has performed various tasks, which include, but are not limited to:

- a. functioning as a surveillance agent, thus observing and recording movements of persons involved in violations of United States Code as well as violations of Arizona State law;
- b. functioning as a case agent, entailing the supervision of specific investigations involving various crimes throughout the United States; and
- c. conducting complex investigations involving transnational criminal organizations committing various crimes throughout the United States.

4. I have consulted with other experienced investigators concerning the practices of transnational criminal organizations and the best methods of investigating them. In preparing this affidavit, I have conferred with other Special Agents and law enforcement officers. Furthermore, I have personal knowledge of the following facts or have learned them from the individual(s) mentioned herein.

5. Based on the below facts, Your Affiant submits there is probable cause that Gerardo Yahir SANCHEZ-SIQUIEROS and Juan ZUNGHA committed the crime of Possession or Receipt of Goods Stolen from Interstate Shipment, in violation of Title 18, U.S.C. § 659.

BACKGROUND

6. Over the past 15 years, several Transnational Criminal Theft Organizations have been burglarizing Burlington Northern Santa Fe (BNSF) Railway as well as Union Pacific trains throughout the Southwest of the United States to include Arizona. These organizations consist primarily of Mexican citizens from the Mexican State of Sinaloa who operate out of Arizona and California, with extensive connections throughout California, Arizona, and New Mexico. The train burglaries have increased in frequency over the past two years.

7. Scouts usually target high value containers on the BNSF railway on Eastbound trains that parallel Interstate 40 near Needles, California. Once the organization targets a particular train of interest, they typically find a location for several train burglars to get on the train. Once on the train, the burglars open container doors while the train is moving and target merchandise to steal such as electronics, tools and wearing apparel. The burglars often target containers with

visible high-security locks and use reciprocating saws, bolt-cutters, or similar tools to defeat the locking mechanisms. Once the burglars target a specific container that has desirable merchandise, the burglars often cut train braking system air hose, which causes the train to go into an emergency stop (commonly referred to as "UDE"), which is a sudden and dramatic application of all the brakes on the train. By cutting an air hose, the burglars' control when and where the train is stopped in order to unload the cargo they target to burglarize. This act is very dangerous and can cause a train to derail, which could ultimately cause serious injury or death to BNSF employees or citizens. The burglars have also sabotaged the train signal system by cutting the locks off signal boxes and then by cutting the control wires inside. This is also a dangerous act that creates dark areas on the rail network, requiring non-traditional train dispatching functions and extensive repairs. High-value trains travel at speeds up to 70 MPH on multiple tracks in both east and west direction. The train crews and train dispatchers rely on the signals for safe transportation.

8. The burglars on the train communicate with follow vehicles utilizing cellular devices, and those follow vehicles surveil the train until it stops, either at a natural stopping point or when the burglars cause the stop, to unload the freight. Once the burglars unload the merchandise from the container that is on the train, the burglars often hide the product in fields or brush adjacent to the BNSF tracks to conceal it until it can be picked up at a later time. The location of the stolen merchandise is then shared by the train burglars with the use of cellular telephones to the surveillance crew who are following the train. A U-Haul, box truck, cargo panel van, or pickup trucks are used to pick up the stolen merchandise if law enforcement is not detected. Once the stolen merchandise has been picked up, it is usually transported to California where it is sold or fenced to wholesale online retailers such as third-party Amazon and eBay resellers.

CURRENT INVESTIGATION

9. On April 15, 2025, BNSF train QLACLPC15 was traveling eastbound from California when it stopped in Williams, Arizona, at railroad mile marker 377 near Airport Road. The train was stopped from approximately 08:20 p.m. until 08:55 p.m. During the BNSF train

stoppage, BNSF agents were notified that several containers were being opened. Several minutes later, BNSF learned GPS technology was inside a Nike master case that was inside container MRKU0302004 that was on BNSF train QLACLPC15. That GPS device indicated that it had departed container MRKU0302004 and was now traveling westbound on Interstate-40 (I-40). Agents responded to the surrounding area and conducted surveillance westbound of Williams, Arizona, along I-40.

10. I conducted Department of Homeland Security import research related to container MRKU03020004 and learned that on March 22, 2025, container MRKU0302004 was shipped on Motor Vessel GUTHORM MAERSK, voyage 511E, which departed from Pusan, Busan, Republic of Korea, and arrived at Los Angeles, California, Seaport on April 9, 2025. After its arrival, container MRKU0302004 was transferred to BNSF for transportation along the Transcontinental railroad. I learned from BNSF Special Agent Porter that the Nike shoes recovered from the two vans were stolen from container MRKU030200 which was a container aboard BNSF train ZLACMEM604.

a. SANCHEZ-SIQUIEROS

11. At approximately 10:26 p.m., DPS conducted a traffic stop on a white van bearing Arizona tag: Z3A53Y on I-40 near mile marker 36 in Griffith, Arizona. The DPS trooper observed that the van did not have operating taillights causing a public safety hazard. The traffic stop conducted by DPS led to a verbal consent search of the vehicle and resulted in the discovery of various Nike shoe master cases (SN: FV5029-100) located in the back of the vehicle. The driver, and the sole occupant, of the vehicle was identified as SANCHEZ-SIQUIEROS. SANCHEZ-SIQUIEROS reported his name to the DPS trooper as “Jesus Acosta.” Upon discovery of the Nike show master cases (STYLE: FV5029-100), SANCHEZ-SIQUIEROS and the white van were detained and transported to the Arizona Department Safety Department in Kingman, Arizona.

12. Open-source research shows that STYLE: FV5029-100 are unreleased Nike Air Jordan 4 Retros and will not be available to the public until May 24, 2025. Each pair has a

manufacturer's suggested retail price of \$225. With approximately 60 master cases, each containing six pairs of shoes, the approximate value of shoes in this van (Arizona tag: Z3A53Y) is \$81,000.

13. At approximately 1:00 a.m., an audio-recorded interview of SANCHEZ-SIQUIEROS was conducted. SANCHEZ-SIQUIEROS was read his *Miranda* warnings in Spanish and agreed to willfully answer questions. SANCHEZ-SIQUIEROS corrected his name with investigators during the interview. SANCHEZ-SIQUIEROS stated that he was offered approximately three (3) to four (4) thousand dollars (\$3,000-4,000) to drive the white van from Flagstaff, Arizona to Los Angeles, California by an unidentified male only known as "Santos." He added that "Santos" provided him with instructions via WhatsApp.

14. SANCHEZ-SIQUIEROS stated that he drove the van from Flagstaff, Arizona to Airport Road in Williams, Arizona. He added that he once he arrived at Airport Road in Williams, Arizona, he saw several Nike shoe master cases and at least ten (10) individuals waiting in a wooded area. SANCHEZ-SIQUIEROS stated the individuals approached the white van and began loading it with the Nike shoe master cases. He added that he assisted loading the Nike shoe master cases into the van. SANCHEZ-SIQUIEROS indicated he believed the boxes contained toys and that he did not know the boxes had been stolen.

15. SANCHEZ-SIQUIEROS stated that once the white van was loaded, he began driving westbound on I-40. He added that if he had arrived in Los Angeles, California, he was told he would be contacted by an unknown individual to learn the drop-off location.

b. *ZUNGHA*

16. At approximately 09:40 p.m., Special Agent (SA) Tazten Starnes located a white van bearing temporary Arizona tag: RBA7GX traveling westbound on I-40 near mile marker 70. A registration check revealed that the white van bearing temporary Arizona tag: RBA7GX was registered to Jaime Cota-Peraza.

17. SA Starnes was aware that Jaime Cota-Peraza was charged in a January 2025 with a train burglary that occurred near Williams, Arizona. On January 13, 2025, a BNSF train

reported a cut air hose near Forest Roads 113 and 114 and Nike shoe master cases were offloaded next to the train. Prior to anyone picking up the stolen goods, investigators traveled near the burglary site and pulled over a Toyota Camry on Forest Road 124. Cota-Peraza was identified as an occupant of the Camry. At that time, there did not appear to be any stolen goods in the Camry and Cota-Peraza was released. Later the same evening, individuals were observed moving the stolen Nike master cases from the BNSF railway into a U-Haul. Once the U-Haul was loaded it traveled from the train site before breaking down on Forest Road 113. A Chevrolet Tahoe traveled north and picked up the individuals who had loaded the U-Haul. The Tahoe was pulled over by Coconino County Sheriff's Deputies as it traveled south into Williams. Cota-Peraza was identified as one of the nine individuals in the Tahoe. Investigators located a key to the U-Haul on one of the passengers in the Tahoe. Cota-Peraza was charged among others with Possession or Receipt of Stolen Goods from Interstate Shipment in violation of 18 U.S.C. §§ 659 and 2 in 25-CR-08020-007-PCT-DJH. Cota-Peraza's case is pending trial.

18. SA Starnes maintained surveillance of the white van bearing temporary Arizona tags: RBA7GX while traveling westbound on I-40. At approximately 10:50 p.m., a DPS trooper followed the white van and observed the license plate light was not working on the van. The trooper pulled over the van at the intersection of Houck Road and Highway 68 in Golden Valley, Arizona.

19. During the traffic stop, Troopers observed a Nike shoe box master case (SN: FV5029-100) in the passenger compartment in plain sight between the front seats. A subsequent search led to the discovery of various Nike Shoe master cases (SN: FV5029-100) located in the back of the vehicle. The driver, and sole occupant, of the vehicle was identified as ZUNGHA. Upon discovery of the Nike show master cases (SN: FV5029-100), ZUNGHA and the white van were detained and transported to the Arizona Department Safety Department in Kingman, Arizona. The DPS Trooper located approximately \$2,000 in cash in ZUNGHA's possession. With approximately 60 master cases, each containing six pairs of shoes, the approximate value of shoes in this van (Arizona tag: RBA7GX) is \$81,000.

20. At approximately 02:00 a.m., SA Gustavo A. Barrera and TFO Curtis Peery attempted to interview ZUNGHA. ZUNGHA was read his *Miranda* warnings in Spanish and invoked his right to remain silent. No questions were asked, and the interview was terminated.

CONCLUSION

21. For these reasons, your Affiant submits that there is probable cause to believe that Gerardo Yahir SANCHEZ-SIQUIEROS and Juan ZUNGHA committed the crime of Possession or Receipt of Goods Stolen from Interstate Shipment, in violation of Title 18, United States Code (U.S.C.) § 659 and aiding and abetting in violation of Title 18, U.S.C. § 2.

22. I declare under penalty of perjury under the laws of the United States of America that the forgoing is true and correct.

GUSTAVO A
BARRERA



Digitally signed by GUSTAVO A
BARRERA
Date: 2025.04.17 15:49:30 -07'00'

Gustavo Antonio Barrera
Special Agent
Homeland Security Investigations

Sworn telephonically and subscribed electronically this 17th day of April 2025.

Camille D.



Digitally signed by Camille D.
Bibles
Date: 2025.04.17 16:13:29
-07'00'

HONORABLE CAMILLE D. BIBLES
United States Magistrate Judge